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**FILED**  
 Clerk  
 District Court

**JUN - 9 2006**

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For The Northern Mariana Islands  
 By \_\_\_\_\_  
 (Deputy Clerk)

10 **UNITED STATES DISTRICT COURT**  
 11 **FOR THE**  
**NORTHERN MARIANA ISLANDS**

12 **TOSHIHIRO TAKAHASHI,**  
 13 **Plaintiff,**  
 14 **vs.**  
 15 **MAEDA PACIFIC CORPORATION,**  
 16 **Defendant.**

**CIVIL ACTION NO. CV 05-0026**

**NOTICE OF ERRATA AND  
 SUPPLEMENT TO JOINTLY  
 PREPARED FINAL PRETRIAL  
 ORDER**

18 **NOTICE OF ERRATA**

19 PLEASE TAKE NOTICE that Plaintiff Toshihiro Takahashi, through his attorneys,  
 20 James Livingstone and Victorino DLG. Torres, has made an error to his damage description that  
 21 needs amendment in the Jointly Prepared Final Pretrial Order dated May 15, 2006 (Exhibit A).  
 22 The current version reads as follows:

23 Page 9 (I) (1)

<u>Damage Description:</u>	<u>Amount Sought:</u>
1. Damages for bodily injuries, pain and suffering, emotional distress, mental anguish and diminished quality of life:	\$300,000.00.

2.	Reimbursement for necessary and reasonable medical expenses incurred from the time of the accident to the present:	At lease \$10,000.00
3.	Reimbursement for necessary and reasonable medical expenses for the remainder of Plaintiff's life:	At least \$20,000.00
4.	Lost revenues:	At least \$32,000.00

The corrected version with changes in italics and strike-outs is as follows:

<u>Damage Description:</u>	<u>Amount Sought:</u>
1. Damages for bodily injuries, pain and suffering, emotional distress, mental anguish and diminished quality of life:	<i>At least \$300,000.00.</i>
2. Reimbursement for necessary and reasonable medical expenses incurred from the time of the accident to the present:	<i>At least \$4,000.00.</i>
3. Reimbursement for necessary and reasonable medical expenses for the remainder of Plaintiff's life:	<i>At least \$10,000.00.</i>
4. <del>Lost revenues:</del>	<del>At least \$32,000.00</del>

The correction addresses inadvertent errors made by the Plaintiff as well as adjustments made because of recent rulings by the Court regarding Defendant's motions in limine.

### SUPPLEMENTS

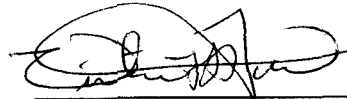
#### **(d) Disclosure of all witnesses**

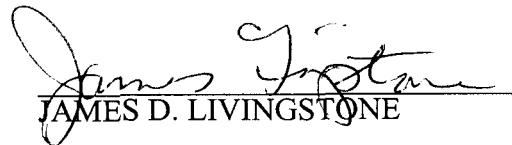
Plaintiff hereby supplements this section for the following reasons. The Defendant revealed on May 26, 2006 for the first time that additional individuals and companies were involved in the work site at issue in this case. Defendant never revealed the fact that these companies and individuals existed in initial disclosures or subsequent discovery. As a result of this belated disclosure, Plaintiff reserves the right to supplement the witness list.

#### **(g) Disposition of all outstanding motions**

1 Plaintiff hereby supplements section for the following reasons. In light of the recent  
2 revelations, Plaintiff believes that Defendant has made sanctionable discovery responses.  
3 Plaintiff is attempting to work out its issues with the Defendant as expeditiously as possible. If it  
4 is unsuccessful, Plaintiff will have to present additional discovery issues to the Court.

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6 DATED: 06 / 07 / 2006.

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VICTORINO DLG. TORRES  
TORRES BROTHERS, LLC.

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JAMES D. LIVINGSTONE

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16  
17 ORDER

18 THIS COURT having reviewed the above notice of errata hereby finds good cause to reflect  
19 the errata in the order.

20 IT IS THEREFORE ORDERED that the above changes shall reflect in the May 15, 2006  
21 Jointly Prepared Final Pretrial Order.

22 IT IS SO ORDERED.

23  
24 DATED: \_\_\_\_\_

25 \_\_\_\_\_  
ALEX R. MUNSON  
CHIEF JUDGE

26 **RECEIVED**

27 **JUN 17 2006**

28  
Clerk  
District Court  
The Northern Mariana Islands